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COUNTY OF SANTA CLARA, NORMA
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AARON WEST, GEORGE KENNEDY,
JOHN HAMILTON, ANITA NOBLE,
JANET KAHLE, MARY RITTER, DAVID
KEARNS, and RAJUI KAZI

E-FILED - 1/17/08

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

| | | |
|--------------------------------|---|-------------------------------------|
| TRACY WATSON et. al., |) | No. C06-4029 RMW |
| Plaintiffs, |) | |
| v. |) | STIPULATION AND ORDER |
| COUNTY OF SANTA CLARA et. al., |) | RESETTING TRIAL DATE AND ALL |
| Defendants. |) | PRETRIAL DEADLINES |

The parties submit the following Stipulation and Proposed Order for the purpose of requesting that the Court postpone by 120 days the trial date, presently set for June 9, 2007, and all pretrial deadlines.

The parties hereby agree and stipulate that additional time is necessary in order to complete discovery, disclosures, and trial preparation.

Further, defendants contend that a final resolution of a pending appeal by Plaintiffs Tracy Watson and Renee Stalker of the jurisdiction and disposition orders of the Superior Court of California, County of Santa Clara, Juvenile Division pertaining to the child-dependency proceedings of Plaintiffs Olivia Stalker, Shafer Watson, and Riley Watson in the Court of

1 Appeal of California, Sixth Appellate Division, could have a bearing on their defenses in this
2 matter. On information and belief, the parties to that appeal have not completed briefing of the
3 matter and are not expected to complete briefing for at least several months. As such, it is
4 unlikely that the state court appeal will reach final disposition prior to the June 9, 2008 trial
5 date.

6 Accordingly, the parties stipulate to have the trial date and all pretrial deadlines, including
7 the last date to hear dispositive motions and all general discovery and expert discovery
8 deadlines, postponed by 120 days, as set forth in the following schedule:

| | |
|---|--------------------|
| 9 Trial | October 6, 2008 |
| 10 Pretrial Conference | September 25, 2008 |
| 11 Last day to hear dispositive motions | August 8, 2008 |
| 12 Expert disclosure | July 11, 2008 |
| 13 Discovery cut-off | August 8, 2008 |

14 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
15 “conformed” signature (/S/) within this efiled document.

16 ANN MILLER RAVEL
17 County Counsel

18 Dated: January 14, 2008

By: /S/
MELISSA R. KINIYALOCTS
Deputy County Counsel
Attorneys for County Defendants

23 Dated: January 8, 2008

By: /S/
JACQUELYN K. WILSON
Attorney for Evergreen School District
Defendants

1
2 Dated: January 11, 2008

By: /S/
CLIFF GREENBERG

Attorney for City of San Jose Defendants

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5
6 Dated: January 4, 2008

By: /S/
PETER JOHNSON

Attorney for Plaintiffs

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10
11 Dated: January 3, 2008

By: /S/
ROBERT R. POWELL

Attorney for Plaintiffs

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14 **ORDER RESETTING TRIAL DATE AND ALL PRETRIAL DEADLINES**

15 The Court, having considered the stipulation of the parties and finding good cause, hereby
16 orders that the June 9, 2008 trial date and all pretrial deadlines, including the last date to hear
17 dispositive motions and all discovery and expert discovery deadlines, are reset according to the
18 following schedule:

| | |
|---|--------------------|
| 19 Trial | October 6, 2008 |
| 20 Pretrial Conference | September 25, 2008 |
| 21 Last day to hear dispositive motions | August 8, 2008 |
| 22 Expert disclosure | July 11, 2008 |
| 23 Discovery cut-off | August 8, 2008 |

24
25 Dated: 1/17/08

Ronald M. Whyte
HONORABLE RONALD M. WHYTE
United States District Court Judge

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